

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

ROSY GIRON DE REYES; JOSE  
DAGOBERTO REYES; FELIX ALEXIS  
BOLANOS; RUTH RIVAS; YOVANA  
JALDIN SOLIS; ESTEBAN RUBEN MOYA  
YRAPURA; ROSA ELENA AMAYA; and  
HERBERT DAVID SARAVIA CRUZ,

*Plaintiffs,*

vs.

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP; WAPLES PROJECT  
LIMITED PARTNERSHIP; and A.J.  
DWOSKIN & ASSOCIATES, INC.,

*Defendants.*

Civil Action No. 1:16cv00563-TSE-TCB

**MEMORANDUM IN SUPPORT OF PLAINTIFFS’  
MOTION TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Local Civil Rule 5, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (“Plaintiffs”) submit this memorandum in support of its Motion to File Documents under Seal. The documents that Plaintiffs request permission to file under seal are Exhibits 2, 4–6, and 9 to Plaintiffs’ Reply in Support of Plaintiffs’ Cross Motion for Summary Judgment. The exhibits consist of excerpts from deposition transcripts and an attorney declaration discussing confidential exhibits.

*Ashcraft v. Conoco, Inc.*, 218 F.3d 282, 288 (4th Cir. 2000), held that documents may be sealed pursuant to district court order when the court: (1) provides notice to the public and gives it an opportunity to object to sealing, (2) considers less drastic alternatives, and (3) provides

specific findings in support of the decision to seal and the rejection of alternatives. Those requirements are met here.

First, Plaintiffs have concurrently filed a Notice of Motion to be docketed by the Clerk. The Notice will provide the public with an opportunity to object to the sealing of the documents in question.

Second, no feasible alternative exists to sealing these documents, in light of the Protective Order requiring information designated confidential pursuant to the Order to be filed with the court consistent with Local Rule 5 of the Eastern District of Virginia. Accordingly, the utmost discretion and confidentiality is necessary, and filings in this action should be kept under seal.

For these reasons, Plaintiffs respectfully request that the Court grant Plaintiffs' Motion to File Document under Seal. A proposed order is attached.

DATED this 17th day of January, 2017      Respectfully submitted,



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QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

Paul Brinkman, VSB # 35950

Jeanhee Hong (*pro hac vice*)

Ariel Wade Trajtenberg (*pro hac vice*)

Diego Durán de la Vega (*pro hac vice*)

Jongwook Kim (*pro hac vice*)

William A. Margeson (*pro hac vice*)

Archith Ramkumar (*pro hac vice*)

777 Sixth Street NW, 11<sup>th</sup> Floor  
Washington, District of Columbia 20001

Phone: (202) 538-8000

Fax: (202) 538-8100

[paulbrinkman@quinnemanuel.com](mailto:paulbrinkman@quinnemanuel.com)

[jeanheehong@quinnemanuel.com](mailto:jeanheehong@quinnemanuel.com)

[arieltrajtenberg@quinnemanuel.com](mailto:arieltrajtenberg@quinnemanuel.com)

[diegoduran@quinnemanuel.com](mailto:diegoduran@quinnemanuel.com)

[wookiekim@quinnemanuel.com](mailto:wookiekim@quinnemanuel.com)

[billmargeson@quinnemanuel.com](mailto:billmargeson@quinnemanuel.com)

[archithramkumar@quinnemanuel.com](mailto:archithramkumar@quinnemanuel.com)

LEGAL AID JUSTICE CENTER

Simon Sandoval-Moshenberg, VSB #77110

Rebecca Wolozin, VSB #89690

6066 Leesburg Pike, Suite 520

Falls Church, VA 22041

Phone: (703) 778-3450

Fax: (703) 778-3454

[simon@justice4all.org](mailto:simon@justice4all.org)

[becky@justice4all.org](mailto:becky@justice4all.org)

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 17th day of January, 2017, I filed the foregoing document electronically with the Clerk of the Court using the ECF system, and caused to be served by electronic mail a copy of the foregoing document upon the following parties:

Grayson P. Hanes, VSB # 06614  
Michael S. Dingman, VSB #30031  
Justin deBettencourt, VSB # 83806  
REED SMITH LLP  
7900 Tysons One Place, Suite 500  
McLean, Virginia 22102  
Phone: (703) 641-4200  
Fax: (703) 641-4340  
[ghaynes@reedsmith.com](mailto:ghaynes@reedsmith.com)  
[mdingman@reedsmith.com](mailto:mdingman@reedsmith.com)  
[jdbettencourt@reedsmith.com](mailto:jdbettencourt@reedsmith.com)

*Counsel for Defendants*



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QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
Paul Brinkman, VSB # 35950

777 Sixth Street NW, 11<sup>th</sup> Floor  
Washington, District of Columbia 20001-3706  
Phone: (202) 538-8000  
Fax: (202) 538-8100  
[paulbrinkman@quinnemanuel.com](mailto:paulbrinkman@quinnemanuel.com)

*Counsel for Plaintiffs*